REMARKS/ARGUMENTS

Prior to the entry of this Amendment, claims 1, 3-5, 7-18, 20-24, 26-31, and 33-39 were pending in this application. Claim 1, 3, 11, 15, 16, 18, 20, 22, 24, 26, 28, 31, 33, 35, 37, and 38 have been amended, no claims have been added, and no claims have been canceled herein. Therefore claims 1, 3-5, 7-18, 20-24, 26-31, and 33-39 remain pending in the application. Applicants respectfully request reconsideration of these claims for at least the reasons presented below.

35 U.S.C. § 103 Rejection, Schneider in view of Cain

The Office Action has rejected claims 1, 3-5, 7-18, 20-24, 26-31 and 33-42 under 35 U.S.C. § 103(a) as being unpatentable over U. S. Patent No. 6,408,336 of Schneider et al. (hereinafter "Schneider") in view of U. S. Patent No. 6,963,573 of Cain et al. (hereinafter "Cain"). The Applicants respectfully traverse the rejection and submit that the Office Action does not establish a *prima facie* case of obviousness in rejecting these claims. Therefore, the Applicants request reconsideration and withdrawal of the rejection.

In order to establish a *prima facie* case of obviousness, the Office Action must establish: 1) some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the references or combine their teachings; 2) a reasonable expectation of success of such a modification or combination; and 3) a teaching or suggestion in the cited prior art of each claimed limitation. See MPEP § 706.02(j). However, the references do not teach or suggest each claimed limitation. For example, neither reference, alone or in combination, teaches or suggests accessing an indication of a first policy from a plurality of policies, the plurality of policies defining policies for self-subscribing to and self-unsubscribing from said first group. The references also do not

teach or suggest, alone or in combination, adding, removing, or both adding and removing an entity as a static member of the group based on such a policy.

As discussed previously, Schneider is directed to "control of access to data in a distributed environment" (col. 1, lines 32-33) and more specifically to making access filters more scalable by decentralizing administration of these filters (col. 5, line 66 - col. 6, line 1). More specifically, Schneider discloses three types of policies, an access policy, an administrative policy, and a policy maker policy. Under Schneider, an access policy defines a user's or group's rights to access particular information while the administrative policy defines a user's ability to or rights to modify membership, i.e., defines who has administrative rights to add or remove members. However, as noted previously and as noted in the Office Action, Schneider does not teach or suggest a plurality of policies for self-subscribing to and self-unsubscribing from a group. Rather, Schneider teaches an administrative policy that defines which user are allowed to add or remove members from a group. The process of adding or removing user to a group under Schneider is then carried out by these designated administrators in a manner similar to that described in the background section of the pending application. In other words, Schneider's administrative policy defines who can act as an administrator, i.e., who can change group membership, but "the administrators who have control over a user group are responsible for correctly defining membership in the user group." (Col. 16, lines 8-11, see also Background of the pending application, page 2, lines 20-28) Schneider also does not teach or suggest adding, removing, or both adding and removing an entity as a static member of the group based on such a policy.

Cain is directed to "receiver access control in a multicast communication system." (Col. 1, lines 21-22) Under Cain, "a policy service is used to determine whether a subscriber device can be admitted to a multicast group." (Col. 2, lines 43-45) "The subscriber device accesses the multicast communication network via an access device [and] the access device uses a policy service to obtain a policy decision from a policy server, where the policy decision indicates whether or not the subscriber device can be admitted to the multicast group." (Col. 2,

lines 45-50) That is, Cain teaches a policy for determining whether a subscriber device can be admitted to the multicast group, i.e., allowing or prohibiting access to a multicast network. "Admitting the subscriber device to the multicast group typically involves establishing appropriate multicast routes for receiving multicast information and forwarding the multicast information to the subscriber device, for example, by joining the multicast group using the multicast routing protocol (e.g., PIM) and setting up appropriate forwarding entries for forwarding the multicast information to the subscriber device over the incoming interface." (Col. 5, line 62 - col. 6, line 3)

However, Cain does not teach or suggest accessing an indication of a first policy from a plurality of policies, the plurality of policies defining policies for self-subscribing to and self-unsubscribing from said first group and adding or removing an entity as a static member of the group based on the application of such a policy. Rather, Cain is directed to determining whether a subscriber device can be admitted to the multicast group, i.e., allowing or prohibiting access to a multicast network. As noted above, in response to determining to allow access, the subscriber device can be forwarded or routed to the content. The Applicants respectfully contend that such routing or forwarding cannot be considered to teach or suggest adding an entity as a static member of a group as recited in the pending claims. Furthermore, Cain does not teach or suggest, alone or in combination with Schneider, unsubscribing a user from a group. Rather, Cain is directed to determining whether a subscriber device can be admitted to the multicast group, i.e., allowing or prohibiting access to a multicast network but is silent with regard to unsubscribing. Thus, the combination of references does not teach or suggest, and the Office Action does not address, unsubscribing a user from a group.

The combination of Schneider and Cain is no more relevant to the pending claims than either reference alone since neither reference, alone or in combination, teaches or suggests accessing an indication of a first policy from a plurality of policies, the plurality of policies defining policies for subscribing to and unsubscribing from said first group. Rather, Schneider teaches an administrative policy that defines which user are allowed to add or remove members

from a group while Cain teaches a policy for determining whether a subscriber device can be admitted to the multicast group, i.e., allowing or prohibiting access to a multicast network. Furthermore, neither reference teaches or suggests, alone or in combination, unsubscribing a user from a group based on such a policy.

Claim 1, upon which claims 3-5 and 7-17 depend, and claim 24, upon which claims 26-30 depend, each recite in part "receiving from a first entity a request to add the first entity to a first group; accessing an indication of a first policy from a plurality of policies, the plurality of policies defining policies for self-subscribing to and self-unsubscribing from said first group; and adding said first entity to said first group as a static member based on said first policy, wherein adding said first entity to said first group as a static member comprises updating an attribute of an identity profile for the first group to include the first entity." Neither Schneider nor Cain teaches or suggests, alone or in combination, accessing an indication of a first policy from a plurality of policies, the plurality of policies defining policies for self-subscribing to and self-unsubscribing from said first group and adding the entity as a static member of the group based on such a policy. Rather, Schneider teaches an administrative policy that defines which user are allowed to add or remove members from a group while Cain teaches a policy for determining whether a subscriber device can be allowed to access a multicast network. For at least these reasons, claims 1, 3-5, 7-17, 24, and 26-30 should be allowed.

Claim 18, upon which claims 20-23 depend, and claim 31, upon which claims 33-36 depend, each recite in part "receiving from a first static member a request to remove the first static member from a first group; accessing an indication of a first policy from a plurality of policies, the plurality of policies defining policies for self-subscribing to and self-unsubscribing from said first group; and removing said first static member from said first group based on said first policy, wherein removing said first entity to said first group as a static member comprises updating an attribute of an identity profile for the first group to remove the first entity. Neither Schneider nor Cain teaches or suggests, alone or in combination, accessing an indication of a first policy from a plurality of policies, the plurality of policies defining policies for self-

subscribing to and self-unsubscribing from said first group and removing the entity as a static member of the group based on such a policy. Rather, Schneider teaches an administrative policy that defines which user are allowed to add or remove members from a group while Cain teaches a policy for determining whether a subscriber device can be allowed to access a multicast network. For at least these reasons, claims 18, 20-23, 31, and 33-36 should be allowed.

Claim 37, upon which claims 38-39 depend, recites in part "receiving from a first entity a request to add the first entity to a first group, accessing an indication of a first policy from a plurality of policies, the plurality of policies defining policies for self-subscribing to and self-unsubscribing from said first group, adding said first entity to said first group as a static member based on said first policy, wherein adding said first entity to said first group as a static member comprises updating an attribute of an identity profile for the first group to include the first entity, receiving from the first static member a request to remove the first static member from the first group, and removing said first static member from said first group based on said first policy, wherein removing said first entity to said first group as a static member comprises updating the attribute of the identity profile for the first group to remove the first entity." Neither Schneider nor Cain teaches or suggests, alone or in combination, accessing an indication of a first policy from a plurality of policies, the plurality of policies defining policies for self-subscribing to and self-unsubscribing from said first group adding the entity as a static member of the group based on such a policy and removing the entity as a static member of the group based on such a policy. Rather, Schneider teaches an administrative policy that defines which user are allowed to add or remove members from a group while Cain teaches a policy for determining whether a subscriber device can be allowed to access a multicast network. For at least these reasons, claims 37-39 should be allowed.

CONCLUSION

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 303-571-4000.

Dated: _____ February 14, 2008 _____   Respectfully submitted,

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